BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE SCHMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES DBP/USPS-98(b) and 100(b) (December 31, 2001)

The United States Postal Service hereby moves for late acceptance of its Objection to interrogatories DBP/USPS–98(b) and 100(b), filed on December 17, 2001. The Objection was due on December 27, 2001 and is thus 2 business days late. The undersigned counsel has been preparing for oral hearing and inadvertently missed the filing date. The Postal Service regrets any inconvenience but does not believe that any party has been prejudiced by this delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3078, Fax –5402 December 31, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 December 31, 2001